



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/13/2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

**THE CITY OF NEW YORK
 LAW DEPARTMENT**
 100 CHURCH STREET, Rm. 3-177
 NEW YORK, NY 10007

ALAN H. SCHEINER
 Special Federal Litigation Division
 phone: (212) 356-3455
 fax: (212) 356-0399
 email: ascheine@law.nyc.gov

November 8, 2023

Via ECF

Hon. Katherine H. Parker
 Southern District of New York
 40 Foley Square, Room 2103
 New York, New York 10007

APPLICATION GRANTED

Katharine H. Parker 11/13/2023
Hon. Katharine H. Parker, U.S.M.J.

Re: *John Doe v. City of New York, et al.*, 22-CV-2690 (PKC) (KHP)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York (the “City”), assigned to the defense of the above-captioned matter. Defendants write to respectfully request that the Court extend the time for defendants to submit their motion pursuant to Fed. R. Civ. P. 37 from November 13, 2023, to November 10, 2023. The Court had set November 10, 2023, as the deadline for that motion, but because that date is a Court holiday the due date would be next business day, which is November 13, 2023. Plaintiff consents to this request and it is the first request for extension of this deadline.

The extension is requested in part because defendants did not anticipate that City offices would be closed on November 7, 2023, in a City-wide holiday. In addition, certain urgent matters have arisen in another matter over the last few business days. Plaintiff requests that if the extension is granted that plaintiff be granted a concomitant extension of time to respond from November 15, 2023, to November 22, 2023, to which defendants consent.

Accordingly defendants respectfully request that the Court extend the time to file their motion from November 13 to November 15, 2023, and the time for plaintiff to respond from November 17 to November 22, 2023.

We thank the Court for its consideration of this matter.

Respectfully submitted,
Alan H. Scheiner /s/
 Alan H. Scheiner
 Senior Counsel

cc (via ECF): Counsel for Plaintiff